## EXHIBIT "A"

## RICO STATEMENT

## **QUESTION #2**

| DEFENDANT   | MISCONDUCT   | BASIS OF<br>LIABILITY         |
|-------------|--|-------------------------------|
| Aradi, Inc. | Aradi, Inc. was a member of the SAAR Network group of companies which includes the following Defendants: African Muslim Agency, Grove Corporate, Inc., Heritage Education Trust, International Institute of Islamic Thought ("IIIT"), Mar-Jac Investments, Inc., Mar-Jac Poultry, Mena Corporation, Reston Investments, Inc., SAAR Foundation, SAAR International, Safa Trust, Sterling Charitable Gift Fund, Sterling Management Group, Inc., and York Foundation. Aradi, Inc. was incorporated on December 8, 1986 in Delaware, listing its primary business address as 555 Grove Street, Suite 110, Herndon, Virginia. This was the same address for SAAR Network entities SAAR Foundation and Safa Trust, as well as Defendant Sanabil Al Khair.  According to the Articles of Incorporation for Aradi, Inc., Defendant Abdullah Sulaiman Al-Rajhi was listed as President, Defendant Hisham Al-Talib was listed as Vice President/Treasurer, Defendant Cherif Sedky was listed as Secretary, Muhammed Ashraf, and Yaqub Mirza. These individuals were also officers/directors of other SAAR Network entities. According to the Affidavit of Senior Special Agent David Kane in Support of Application for Search Warrant (October 2003) filed in the United States District Court for the Eastern District of Virginia In The Matter of Searches Involving 555 Grove Street, Herndon, Virginia, and Related Locations, Hisham Al-Talib was also an officer of African Muslim Agency, Grove Corporate, IIIT, Mar-Jac Investments, Inc., Mar-Jac Poultry, Mena Corporation, Reston Investments, Inc., SAAR Foundation, SAAR International, and Safa Trust; Cherif Sedky was also an officer of Grove Corporate and SAAR Foundation; Muhammed Ashraf was also an officer of Mar-Jac Investments, Sterling Charitable Gift Fund, Sterling Management Group, and York Foundation, Reston Investments, Inc., Mar-Jac Investments, Inc., Mar-Jac Investments, Inc., Mar-Jac Investments, Sterling Charitable Gift Fund, Sterling Management Group, and York Foundation, Reston Investments, Inc., Mar-Jac Investments, SAAR Foun | 1962(a)<br>1962(c)<br>1962(d) |
|             | 1 -  |                               |

Foundation.

The Al-Rajhi family in Saudi Arabia was a primary financier of the SAAR Network Entities, including Aradi, Inc. The SAAR Foundation was named after Sulaiman Abdul Aziz Al Rajhi, a close relative of Abdullah Sulaiman Al Rajhi who sits as President of Aradi, Inc. Abdullah Sulaiman Al Rajhi was also listed as the General Manager of Defendant Al-Rajhi Banking and Investment Corporation as noted on the bank's website.

Cherif Sedky was also listed as the Registered Agent of Aradi 1212 New York Avenue Inc., which was incorporated on September 25, 1990 in Washington, D.C. Abdullah Sulaiman Al Rajhi was listed as a director of Aradi 1212 New York Avenue Inc., and listed his address as 11919 Safa Court, Herndon, Virginia. However, he listed his name incorrectly on the Articles of Incorporation as "Abdullah Sulayman Abdul Aziz". Another director of Aradi 1212 New York Avenue Inc. was Fahad Sulayman Abdul Aziz who listed his address as P.O. Box 28, Riyadh, Saudi Arabia, which was the address of Al Rajhi Banking and Investment Corporation.

These connections between charities comprising the SAAR Network and Al Rajhi Banking and Investment Corporation provided a financial conduit for the movement of money to the terrorist groups these businesses, individuals, and charities supported. As a result, Aradi, Inc. knowingly, for a period of many years, provided critical financial and logistical support to al Qaeda, and/or Radical Muslim Terrorism, and/or the International Islamic Front for the Jihad Against Jews and Crusaders, to support the terrorist organization's global jihad. The September 11<sup>th</sup> Attack was a direct, intended and foreseeable product of the aforementioned Aradi Inc.'s participation in the jihad campaign for al Qaeda, and/or Radical Muslim Terrorism, and/or the International Front for the Jihad Against Jews and Crusaders.